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April 28, 2022

Hon. John G. Koeltl  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan, United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

RE: Kesner, et al. v. The Palestinian Authority, et al., 1:18-cv-12238-JGK

Dear Judge Koeltl:

In accordance with this Court's April 15, 2022 Order, I write on behalf of the parties to provide the Court with a further status update. On August 18, 2020, the United States Court of Appeals for the District of Columbia Circuit remanded *Klieman v. Palestinian Authority*, 1:04-cv-01173-PLF (D.D.C.) ("*Klieman* matter") to the United States District Court for the District of Columbia for further proceedings in light of the Promoting Security and Justice for Victims of Terrorism Act of 2019 (PSJVTa), Pub. L. No. 116-94, div. J, tit. IX, § 903, 133 Stat. 3082-3085.

On August 24, 2020, the parties submitted a Joint Status Report to the Court requesting this matter continue to be stayed pending further ruling of the D.C. District Court in the *Klieman* matter regarding the applicability of the PSJVTa. On August 27, 2020, this Court granted the parties' joint request that this matter continue to be stayed while the D.C. District Court considered the relevant issues and in accordance with this Court's previous Orders (ECF 40, 42). Since that time, the *Klieman* matter is still proceeding before the D.C. District Court.

The parties have met and conferred and agree that while the *Klieman* matter continues to proceed before the D.C. District Court, the prior status quo as reported to this Court in their last Status Report supporting a stay is unchanged. Therefore, the parties respectfully request this Court continue the stay this matter in accordance with this Court's previous Orders.

Respectfully submitted,

HEIDEMAN NUDELMAN & KALIK, P.C.

By: 

Noel J. Nudelman

cc: All Counsel of Record (via ECF)